

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TERRY CLOTZ, on behalf of himself and
others similarly situated,

Plaintiff,

v.

THE FEDERAL SAVINGS BANK, RASANI
MEDIA and SUREFIRE MARKETING LLC,

Defendants.

Case No. 22-cv-3755

Honorable Jeremy C. Daniel

PARTIES' JOINT MOTION TO EXTEND DISCOVERY DEADLINES

NOW COMES Defendants Rasani Media and The Federal Savings Bank (collectively “Defendants”), and Plaintiff Terry Clotz (“Plaintiff”, and with the Defendants, the “Parties”), by and through their undersigned counsel, and respectfully requests an extension of the discovery deadlines in light of the Parties’ ongoing settlement discussions. In support thereof, the Parties state as follows:

1. Plaintiff brings the instant class action matter alleging violations of the Telephone Consumer Protection Act (“TCPA”) (the “Action”).

2. On March 11, 2024, the Court entered a scheduling Order setting discovery deadlines, as set forth in paragraph 6 below.

3. On July 10, 2024, the Parties engaged in a mediation session with the Hon. David Jones (Ret.) with Resolute Systems.

4. Although the Parties were not able to reach a resolution of this case, they did make progress. At the end of the session, Judge Jones suggested that the Parties seek an extension of

discovery deadlines for 45 days while the parties continue settlement discussions (with his assistance).

5. The Parties have conferred, and agree with Judge Jones' suggestion, and wish to continue settlement discussions to see if they can resolve this case before expending additional resources in discovery, which would include several depositions that are currently scheduled.

6. The Parties therefore request that the following discovery deadlines, previously set on March 11, 2024, be reset as follows:

Deadline	Current Date	New Proposed Date
Fact Discovery Close	September 9, 2024	October 24, 2024
Initial Expert Disclosures	October 11, 2024	November 25, 2024
Rebuttal Expert Disclosures	November 29, 2024	January 13, 2025
Expert Discovery Close	January 10, 2025	February 24, 2025
Status Hearing	January 14, 2025	February 28, 2025

WHEREFORE, Defendants requests that this Honorable Court enter an order resetting the discovery deadlines as set forth above.

Dated: July 15, 2024

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CERTIFICATE OF SERVICE

The undersigned certifies that on July 15, 2024, he served the foregoing **Parties Joint Motion to Extend Discovery Deadlines** on All Attorneys of Record. This pleading was served upon the attorneys as listed above, pursuant to the Northern District of Illinois General Order on Electronic Case Filing.

[x] Pursuant to 28 USC Section 1746(2),
I certify under penalty of perjury that
the foregoing is true and correct.

Executed on: July 15, 2024

/s/ John C. Ochoa